

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
Philadelphia Division**

Douglas V. Gratz,

Debtor.

Case No. 25-10091-PMM
Chapter 13

Motion to Extend the Automatic Stay

Debtor Douglas V. Gratz, through their attorney, moves this Court as follows:

1. The Debtor filed a bankruptcy petition on January 9, 2025. They have yet to file a plan and all schedules, statements, and other documents required by 11 U.S.C. §521(a)(1) and Fed. R. Bankr. P. 1007(b), but will do so in a timely fashion.
2. The Debtor was involved in one active bankruptcy between January 10, 2024, and January 9, 2025:

Case No.	District	Filed	Dismissed	Reason
24-10376	PAEB	02/05/2024	07/10/2024	Unreasonable Delay

3. Because the Debtor was involved in only one active bankruptcy between January 10, 2024, and January 9, 2025, the automatic stay is set to expire on February 8, 2025. 11 U.S.C. § 362(c)(3)(A).

4. The Court may extend the automatic stay when a case is filed in good faith as to the creditors to be stayed. Good faith means that there are new circumstances demonstrating that the Debtor can probably reach the end of a chapter 13 plan. *In re Legree*, 285 B.R. 615, 620 (Bankr. E.D. Pa. 2002).


5. This case was filed in good faith. During the prior case, the debtor was dealing with the legal consequences of past offenses as well as pharmacological dependency. However, he has since entered the penal system and successfully sought and completed rehabilitative treatment. And his income has increased as well.

6. Because this case was filed in good faith, the Court must continue the automatic stay against all creditors until the Debtor receive a discharge.

For those reasons, the Court must grant relief in the form of order attached, and further in the Debtor's favor if necessary and proper under the law.

Date: January 9, 2025

CIBIK LAW, P.C.
Counsel for Debtor

By: 
Michael A. Cibik (#23110)
1500 Walnut Street, Suite 900
Philadelphia, PA 19102
215-735-1060
mail@cibiklaw.com